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July 11, 2025

**VIA ECF**

The Honorable Jennifer E. Willis, U.S.M.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 425  
New York, New York 10007

Re: **JOINT LETTER WITH PROPOSED DISCOVERY SCHEDULE PER JUNE 25 ORDER (ECF NO. 136)**

*Brockmole, et al. v. EZ Festivals LLC, et al.*  
*Avchukov, et al. v. Avant Gardner, LLC, et al.*  
*Palie, et al. v. EZ Festivals LLC, et al.*  
*Ting, et al. v Avant Gardner LLC, et al.*  
Case No. 1:23-cv-08106-VM (Consolidated)

Dear Judge Willis:

Our firm represents Defendants EZ Festivals LLC, Avant Gardner LLC, Made Event LLC, Jurgen Bildstein, CityFox, Reynard Productions, and AGDP Holding, Inc. in the above four putative class action lawsuits. Together with counsel for all Plaintiffs, and pursuant to the Court's June 25, 2025 Order (ECF No. 136), we write jointly with an update following the last Settlement Conference and with the parties' proposed discovery scheduling.

As directed at the June 25<sup>th</sup> Settlement Conference and the Order that followed, on June 30, 2025, Defendants provided Plaintiffs with a discovery memo detailing the steps Defendants have taken in this litigation. Further, on July 7, 2025, Plaintiffs relayed their counteroffer to Defendants, which Defendants are currently reviewing.

The parties have met and conferred as directed by the June 25<sup>th</sup> Order and they jointly propose the following schedule for remaining discovery:

1. Defendants to complete initial production by September 30, 2025;
2. Depositions to commence no earlier than September 15, 2025;
3. All fact discovery completed by January 30, 2026;
4. Any expert discovery completed by March 6, 2026;
5. Summary judgment motions by March 31, 2026;

We thank the Court for its consideration of these dates and for continuing to help the parties in their resolution discussions.

Respectfully submitted,

KAUFMAN DOLOWICH LLP

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